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ECF Filing

Honorable Vincent F. Papalia, U.S.B.J.
Clerk United States Bankruptcy Court
MLK Jr. Federal Building
50 Walnut St.
Newark, N.J. 07102

Re: In re: Anthony C. Curto, Jr. dba TMT Trucking dba Total Metal Transport & Trucking LLC, et al.
Case No. 20-14300-VFP

Dear Judge Papalia:

I represent Kingtown Truckstop, LLC, ("Kingtown"), in the above referenced Sub Chapter 5 Bankruptcy case. Currently pending is the Debtors' application to close the case returnable December 9, 2021. Kingtown is entitled to two different types of payments under the Debtors' plan, \$30,000.00 in priority payments as a convenience class creditor commencing in July 2022 and \$7,721.00 in payments as a general unsecured creditor commencing June 2025. Kingtown has no objection to a closing of the case so long as it is without prejudice to Kingtown's right to move to re-open the case or otherwise seek appropriate relief if the Debtors default in their obligations to Kingtown under the plan. Accordingly, I am requesting that the Order closing the case provide that in the case of a default in the Debtors making all required plan payments any aggrieved creditor under the plan can move to re-open the case or otherwise seek appropriate relief.

Thank you for the Court's consideration of this request.

Respectfully submitted,

Michael Shapanka

Michael Shapanka

CC: Karina P. Lucid, Esq. (Via ECF)
Mark Edward Hall, Esq. "
Mitchell Hausman, Esq., Office of U.S. Trustee "